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October 15, 2024

Via ECF

Hon. Karen M. Williams
United States District Court
Mitchell H. Cohen U.S. Courthouse
4th & Cooper Streets
Camden, New Jersey 08101

So Ordered this 16th day
of October, 2024


KAREN M. WILLIAMS
UNITED STATES DISTRICT JUDGE

Re: S.S. v. Collins
United States District Court, District of New Jersey
Civ No. 23-0892

Dear Judge Williams,

Our office represents the plaintiff, S.S. I write to unfortunately once again request an additional 30 days to provide supplemental records pursuant to this Court's August 14, 2024 order.

On September 3, 2024, a subpoena for records was served on the Mid Willamette Valley Council of Governments ("MWVCOG"), Ms. Collins' employer (Exhibit 1). When our office did not receive a response, I contacted Ms. Linda Hansen, the Administrative Support Coordinator for MWVCOG. She informed me that she received the subpoena, but then gave it to directly to Ms. Collins because she mistakenly thought it was for the defendant. After our telephone call, I emailed Ms. Hansen a courtesy copy of the subpoena. This morning, I received an email from Laura Conroy, JD, an attorney from MWVCOG. She informed me that MWVCOG does not accept service via email and is now requesting the jurisdictional grounds for subpoenaing MWVCOG (see Exhibit 2).

It is our intention to provide the court with the complete records and medical report in one filing, but the roadblocks put in place by Ms. Collins and her employer has made that difficult.

I apologize to the court for the delay in concluding this matter.

Respectfully submitted,

/s/Daniel Szalkiewicz
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